



**-UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

November 13, 2007

Ms. Denise Decker  
St. Elizabeths Project Team  
General Services Administration, National Capital Region  
301 7<sup>th</sup> Street, SW, Room 7600  
Washington, DC 20407

Re: Draft Environmental Impact Statement for the Department of Homeland Security  
Headquarters at the St. Elizabeths West Campus, Washington, D.C. (CEQ # 20070401)

Dear Ms. Decker:

In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement of the Department of Homeland Security Headquarters at the St. Elizabeths West Campus. As a result of this review, EPA has assigned this Draft Environmental Impact Statement (DEIS) a rating of EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of this project. A copy of EPA's ranking system is enclosed for your information.

The primary purpose of this proposed action is to develop 4.5 million square feet of secure office space, plus parking (up to 1.8 million gross square feet to accommodate approximately 5,300 vehicles) at the St. Elizabeths West Campus to house the consolidated headquarters of the Department of Homeland Security (DHS) and its components which would result in bringing approximately 14,000 employees to the site. The St. Elizabeths West Campus consists of 176 acres which has been designated as a National Historic Landmark (NHL). The NHL documentation has identified 62 contributing buildings and 60 landscape features on the West Campus.

EPA's review of the proposed action has raised questions and concerns with the following areas of interest: alternatives, transportation, environmental justice, vegetation/historic woodland/cultural landscape, and soil/surface water/groundwater contamination. Specific concerns are addressed below.

**Alternatives**

EPA understands that the proposed action assessed in the DEIS is the creation and implementation of a Master Plan for redevelopment of the St. Elizabeths West Campus for the DHS Headquarters. As explained in the DEIS, a Master Plan is guided by defined objectives



and goals, which describe an overall development concept, including both present property uses as well as future land development plans.

As noted in the DEIS on page 2-5, “The total current requirement of office space for DHS Headquarters and its components throughout the National Capital Region (NCR) is 7 million gross square feet (gsf), plus parking needs.” “This figure is expected to grow to approximately 8 million gsf over the next several years.” “DHS has analyzed the critical core mission execution functions and determined that a minimum critical mass of 4.5 million gross square feet, plus parking, is needed to meet the department’s mission requirements and to develop a more cost-effective real estate portfolio in the NCR.”

Using the minimum critical mass specified by DHS, GSA identified four alternatives all of which included development of approximately 4.5 million gsf of office space plus parking. Two preferred alternatives were selected by GSA; they are Alternatives 3 and 4. Thus, both of the preferred alternatives include development of approximately 4.5 million gsf of offices space and support space to accommodate approximately 14,000 DHS employees plus 1.8 million gsf of parking. All of the alternatives vary in the distribution of density and impacts.

Specific differences among the preferred alternatives are: Alternative 3 more efficiently supports the programmatic requirements of DHS—space, adjacencies, functionality of the adaptively reused historic buildings—while including steps to minimize harm to the historic qualities of the site. Alternative 4 includes steps to minimize harm to the historic qualities of the site—including the creation of a preservation area in the central historic core of the campus.

Because all of the alternatives are similar in that they provide for development of 4.5 million gsf, plus parking to accommodate 14,000 employees; EPA questions whether the alternatives proposed vary enough to provide a significant difference and to be considered and compared with each other. As described in the regulations of the Council on Environmental Quality (CEQ) (40 CFR §1502.14), the examination and comparison of the alternatives under consideration is the heart of the environmental document. It is through this comparison that the public is able to make informed decisions with regard to the merits of the project and the advantages and disadvantages of each of the alternatives being studied. The alternatives analysis is limited by meeting the DHS criteria of 4.5 million gsf.

In addition, the DEIS does not address the future land development plans of the site aside from the alternatives proposed. It is stated that there is a total DHS requirement of 7 million gsf of office space with an approximate growth potential to 8 million gsf. EPA questions that the additional space and growth potential could have a negative bearing on the already taxed historic landmark in the future. The Master Plan does not specify restrictions of future development on the historic site. It is presumed that other DHS components will be assigned space outside of the St. Elizabeths West Campus. Has it been assessed whether some components could in fact be combined with those in the alternative location(s) to eliminate the excessive number of people drawn to St. Elizabeths and reduce the density proposed? Is there adequate space within close proximity to St. Elizabeths to accommodate the 2.5 million gsf



needed for the remaining DHS components to provide efficient and effective operations among DHS locations? Is there a potential threat of future development and/or is there a commitment to not build beyond what is proposed? The DEIS is presented as a Master Plan, yet there is no mention of the preparation of additional NEPA evaluation and documentation as the proposed actions are addressed and implemented.

### **Historic Preservation**

It is without question that the alternatives at the level of density proposed will significantly impact the NHL site which could affect the integrity of the entire site. The DEIS emphasizes the primary goal to meet the DHS density criteria despite the significantly adverse impact to the NHL site. Section 110(f) of the National Historic Preservation Act (NHPA) requires federal agencies to minimize harm to National Historic Landmarks. In fulfilling the requirements of Section 106 and its implementing regulations, federal agencies are required to develop alternatives and measures to avoid or mitigate adverse effects to historic resources. Section 106 also requires that federal agencies provide the Advisory Council on Historic Preservation (ACHP) with the opportunity to comment on the undertaking. The density proposed does not show efforts to minimize impacts to the St. Elizabeths West Campus NHL. Since this area of authority falls outside of EPA's jurisdiction, comments on this area of impact are being deferred to agencies of authority.

### **Transportation**

EPA is concerned with the significantly large number of employees (14,000) that would be directed to the West Campus site. This quantity will surely impact the roadways and it isn't clear whether the proposed transportation improvement plans will successfully carry the number of employees proposed. As a result, EPA questions the assessment of transportation and addresses these concerns listed below.

The DEIS proposes four transportation alternatives for the Malcolm X/I-295 Interchange all of which impact the Section 4(f) resource, the Shepherd Parkway. The Shepherd Parkway qualifies for Section 4(f) protection as both a park and a historic site. The roadway alternatives would require the direct use of forested parkland for the reconstruction of the northbound off-ramp from I-295 to Malcolm X Avenue. The Shepherd Parkway is part of the Fort Circle Parks, a series of parklands which contain Civil War earthworks. Land on the Parkway was set-aside by the United States to build a Fort Circle Drive. EPA is aware that coordination has been ongoing with National Park Service (NPS) and the DC Historic Preservation Office as impacts to these resources fall within their authority; thus, EPA is deferring the rating of a preferred alternative to the responsible agencies. The DEIS does not select a preferred transportation alternative nor does it show a relationship between the build alternatives and the interchange alternatives to assist the reviewer in analyzing and rating the interchange alternatives. In addition, it isn't certain that the interchange alternatives adequately address the congestion projected for the site.



As noted on page 2-13, the National Capital Planning Commission's (NCPC) policy is one parking space for every four employees (1:4); yet the site plans are designed for a ratio of 1:3. Page 3-18 states that, "The final parking ratio on the site would be determined through preparation of a Transportation Management Plan." However, as noted on page 5-164, "A Transportation Management Plan identifying strategies to reach a 1 to 3 parking ratio will be included in the Final EIS." EPA questions the purpose of the Transportation Management Plan—is it to determine the best parking ratio suitable to the site or to meet the 1:3 parking ratio? It does not appear as if the NCPC policy of 1:4 is the precedent; rather the intent is to justify the need for 1:3 parking ratio.

As noted on page 4-191, there are two Metrorail stations near the St. Elizabeths site, the Anacostia and Congress Heights stations. The Anacostia Metrorail is approximately 0.5 miles away from the St. Elizabeths site which is approximately a 10 minute walk and the Congress Heights Metrorail station is approximately 0.9 miles away which equates to roughly a 24 minute walk. This is a valuable transportation resource to be utilized in transporting employees to the site. Did GSA consider making better use of this existing resource, such as providing shuttle buses or researching the feasibility of extending the line with a stop at St. Elizabeths? This would not only address the transportation issue, it would also benefit air quality. The DEIS states on page 4-173, "According to the Metropolitan Washington Council of Governments (MWCOG), existing air quality in the vicinity of the St. Elizabeths West Campus, and in the region, is influenced primarily by transportation-related mobile sources (predominately motor vehicle traffic on adjacent roadways)." Reducing the use of motor vehicles commuting to the site would be advantageous to the air quality in the St. Elizabeths area.

### **Environmental Justice**

The population in the vicinity of the St. Elizabeths West Campus is overwhelmingly minority and low-income. Measures should be taken to assure that this community is not disproportionately impacted by the proposed action to be taken at this facility. The DEIS needs to focus greater concern on the potential for adverse and/or disproportionate impacts on that community. For example, there may be significant impacts related to increased traffic as a result of this proposed action. In addition, there needs to be careful consideration of fugitive dusts, noise, vibration, and other potential impacts associated with such actions.

There is concern that outreach efforts need to be extended to local churches and civic groups in an effort to assure wider participation of the citizens in the community. Notices should also be extended to include local ethnic news outlets, which tend to be more widely read by local residents.

### **Vegetation/Historic Woodland/Cultural Landscape**

As a result of the build alternatives and the interchange alternative, there is a significant loss to vegetated areas. It is noted in the Federal Elements section of The Comprehensive Plan for the National Capital, that a Federal action in the region should conform to a number of policies; one of which states as follows: "(3) Minimize tree cutting and other vegetation removal



to reduce soil disturbance and erosion, particularly in the vicinity of waterways. When tree removal is necessary, trees should be replaced to prevent a net tree loss.” With a Forest Management Plan to be developed and implemented for the site, it is recommended that tree replacement be considered to prevent a net tree loss.

All alternatives would result in the construction of a bridge linking the plateau behind the Center Building with the lawn area of Buildings #60, #64, #66 through #69, #70, and #72 through #75 which would result in the loss of trees in the historic woodland. The DEIS states that the extent of this loss cannot be evaluated until the bridge design is further refined. EPA questions the necessity of building the bridge and whether it outweighs destroying the historic woodland. If the bridge is necessary, bridge design should be that which minimally impacts the historic resource. The FEIS should provide an estimate of historic woodland loss to assess the potential loss and the cumulative loss from other proposed development on the site.

Page 5-46 states that a Landscape Protection Plan would be prepared for use during construction activities; however, major construction in significant landscape areas severely limits opportunities for mitigation. Thus, the impacts to landscape areas are adverse with little hope for adequate mitigation. How then will the Landscape Protection Plan serve to protect identified cultural landscape resources?

### **Soil, Surface Water, and Groundwater Contamination**

Page 4-218 states that, “On all three occasions, they reported liquid phase hydrocarbons (LPH) were no longer present in the wells. However, the source of contamination was not reported to have been discovered and/or subsequently removed from the site.” Is monitoring planned to ensure safety since the source of contamination has not been determined?

It was noted that a Dioxin Remedial Investigation was performed by G&O which revealed the presence of ash, fill, and other materials in some places. The DEIS does not address safety as well as any possible impacts on the buildings proposed from this hazardous material. It is assumed that the ash is from the on-site waste incinerator or coal-fired power plant. Depths of ash/fill at the West Campus approach 45 feet in depth at some locations. As a result, there is contamination of the surface waters, sediments in surface waters, surface soils (including ash waste piles), subsurface soils, and groundwater at the site. The Dioxin Remedial Investigation report identified the following contaminants in one or multiple media sampled: volatile organic compounds (VOCs) including petroleum hydrocarbon-related constituents, polycyclic aromatic hydrocarbons (PAHs), elevated levels of various metals, and dioxin and furan (D/F) congeners. Contamination was identified in nearly all media analyzed (surface water, sediments, surface soils, and subsurface soils).

Page 7-72 states that, “Groundwater samples taken on the St. Elizabeths West Campus has petroleum contamination, and lead and barium contaminant levels that exceeded the DC Groundwater Quality Standards.” Some remedial actions were undertaken by GSA to combat petroleum contamination for on-site groundwater; however, sources of petroleum contamination have not been identified.” EPA questions whether lead and barium remedial actions have been



undertaken. Also, the status of petroleum contamination should be indicated and whether additional efforts will be conducted to determine the source of petroleum contamination. Will future monitoring be planned to ensure safety since the source of contamination has yet to be determined?

The DEIS states that a Risk Assessment will be completed in September 2007. This document will evaluate the various exposure pathways (including dermal contact, inhalation, and incidental ingestion), human characteristics, and activity factors application to the West Campus. "The Risk Assessment will also evaluate the fate and transport of the identified analytes and quantify the potential human and ecological exposures and risks based on the planned site utilization." The FEIS should address the areas of concern mentioned providing an association with the results of the Risk Assessment. The Risk Assessment is a critical resource that would affect implementation of the proposed actions; thus, its results should be disclosed in the FEIS.

### Miscellaneous

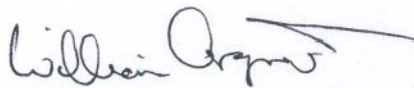
It is noted in the discussion of Alternative 3 that, "The development also demolishes all remaining structures (retaining wall, walks, and steps) on the former site of the West Lodge." The formal West Lodge should be indicated on a map.

Both Alternatives 3 and 4 mention that, "One of the oldest hospital roadways, now known as Sweetgum Lane, is also affected by this work." Page 5-90 states that "Specimen trees and the American holly grove would be lost from construction of a new building to the south of Sweetgum Way." The FEIS should mention the degree of impact and depict Sweetgum Lane/Way on a map.

It is stated on page 5-59 that, "New construction in the area of the Allison Buildings would obstruct views from St. Elizabeths' East Campus, and new buildings near the Point would be visible from the surrounding neighborhood." The Allison Buildings should be depicted on a map.

Thank you for providing EPA with the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,



William Arguto  
NEPA Team Leader  
Office of Environmental Programs

Enclosure (1)

